

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

DAWSON M. ROUSE

INFORMATION

Case No. 1:20-cr-107

Violations: 18 U.S.C. §§ 2252(a)(2),
2252(b)(1), 2422(b), and 2428

COUNT ONE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about January 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce E.V., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

Attempted Receipt of Images Depicting the Sexual Exploitation of a Minor

From in or about January 2020 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly attempted to receive visual depictions of M.G. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THREE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about March 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.D., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FOUR

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce R.J., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FIVE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

In or about April 2019, in the District of North Dakota,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.B., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SIX

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about March 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce M.R., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SEVEN

Attempted Receipt of Images Depicting the Sexual Exploitation of a Minor

From in or about February 2018 to in or about June 2018, in the District of North Dakota,

DAWSON M. ROUSE

knowingly attempted to receive visual depictions of B.T. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT EIGHT

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about January 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce L.W., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT NINE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly persuade, induce, entice, and coerce J.T., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about January 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce C.L., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT ELEVEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce D.B., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWELVE

Attempted Receipt of Images Depicting the Sexual Exploitation of a Minor

From in or about September 2018 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly attempted to receive visual depictions of G.L. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTEEN

Attempted Receipt of Images Depicting the Sexual Exploitation of a Minor

From in or about January 2018 to in or about December 2018, in the District of North Dakota,

DAWSON M. ROUSE

knowingly attempted to receive visual depictions of C.S. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FOURTEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about March 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce P.V., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FIFTEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about April 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.S., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SIXTEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

In or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.J.M., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SEVENTEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about June 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce R.P., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT EIGHTEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about July 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.J., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT NINETEEN

Attempted Receipt of Images Depicting the Sexual Exploitation of Children

From in or about April 2019 to in or about June 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly attempted to receive visual depictions of S.S. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT TWENTY

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

From in or about November 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce E.A., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-ONE

Receipt of Images Depicting the Sexual Exploitation of Children

From in or about February 2019 to in or about May 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received, and attempted to receive, visual depictions of K.B. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

FORFEITURE ALLEGATION


Upon conviction of violating Title 18, United States Code, Section 2422(b), as charged in this Information,

DAWSON M. ROUSE

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof, and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- One iPhone XS; Serial number G0NXN3A4KPFX.

By virtue of commission of the felony offenses as charged in this Information, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States pursuant to Title 18, United States Code, Section 2428.


NICHOLAS W. CHASE
Acting United States Attorney

GLD/tg